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IED-EPRTR-Revision-OPC-2020

Fields marked with * are mandatory.

Survey for Public Consultation

Introduction: European Green Deal, and the Role of Industry in Cleaning and Greening the EU

The European Green Deal sets the overall strategy on dealing with climate-related and wider environmental challenges whilst achieving "greener" EU economic growth.

In parallel, the Industrial Strategy for Europe highlights the need for new processes and technologies, innovation and investment to strengthen our industrial competitiveness and facilitate industry's shift to a climate neutral, clean and circular economy.

Since 1996, integrated pollution prevention and control (IPPC) methodologies and legislation has been the way in which the EU's Member States have issued environmental permits to govern the operation of larger industrial plants. The latest version of the EU legal rules is called the Industrial Emission Directive (IED) - Directive 2010/75/EU. The IED is effective in controlling pollution to air, water and soil from larger industrial and agricultural plants in an integrated way, and in pushing forward the incorporation of innovative "Best Available Techniques" [1]

Working hand-in-hand with the IED, the European Pollutant Release and Transfer Register (E-PRTR) Regulation (EC) 166/2006 (as amended) is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

The new European Green Deal and the Zero Pollution Ambition for Europe

The European Green Deal, adopted in December 2019, seeks to go way beyond the current policies to control emissions to air, water and soil. It sets out a long-term pathway to 2050, to ensure a climate-neutral, clean and circular economy, optimising waste management and minimising pollution over this timeframe.

The Green Deal commits inter alia to:

- 1. adopting an action plan towards a zero pollution ambition. Separate consultations on the Zero Pollution Action Plan initiative are ongoing.
- 2. revising EU measures to address pollution from large industrial plants, including both the IED and the E-

PRTR, to:

- Look at the sectoral scope of the legislation and at how to make it fully consistent with climate, energy and circular economy policies
- · Ensure that industry sectors maintain their role in improving the EU's environment
- Increase the take-up by industry and agricultural sectors of novel and proven techniques to create a
 more sustainable EU economy, at the same time as achieving a cleaner environment that improves
 public health
- Improve public access to environmental information.

The scope of the revisions mentioned above are summarised in two brief documents: the IED inception impact assessment and the E-PRTR inception impact assessment.

The IED (Industrial Emissions Directive) - in more detail

The IED controls the environmental impacts of over 50,000 of the larger-scale agricultural and industrial activities in an integrated manner, to achieve a high level of protection of the environment. Activities regulated by the IED include power plants, refineries, waste treatment and incineration, production of steel, non-ferrous metals, cement, lime, glass, chemicals, ceramics, pulp and paper, food and drink, as well as the intensive rearing of pigs and poultry.

National authorities are obliged to issue permits for plants conducting activities under the scope of the IED, with permit conditions based on the use of Best Available Techniques (BAT). To ensure a consistent EU approach, sectoral BAT reference documents (BREFs) – tailored to each agricultural or industrial activity - are produced via EU-wide assessment with Technical Working Groups whose members include environmental and civil society NGOs, industry associations, EU Member States and the European Commission. So-called 'BAT conclusions' derived from these discussions, are then formally adopted into EU law and are binding. EU Member States' permitting authorities must use these as the reference when setting permit conditions.

The IED was evaluated earlier in 2020 to check how it was functioning. Findings from this evaluation included:

- Pollution is still occurring across the EU from large (agro)industrial plants (including emissions to air, water and soil; and use of harmful substances)
- Extending the IED to other sectors or activities could be appropriate, or thresholds at which plants become subject to the IED might be changed, in order to reduce significant pollution
- Member States are implementing EU IED requirements in a heterogeneous manner, including the stricter BAT conclusions measures. The result is that the environmental ambition varies across the EU's Member States
- Further efforts could be made to support the decarbonisation efforts of large-scale industries and agricultural activities as a whole
- Large industrial and agricultural facilities could contribute more to a circular economy, and their exploitation of natural resources could be reduced
- The IED may be able to more proactively promote new production processes, technologies and innovation
- Greater coherence and synergies with other EU legislation (e.g., the Emissions Trading System, the Landfill Directive and waste management opportunities) could be exploited.

There is insufficient public access to information, participation in decision making and access to justice
with regard to permitting decisions and revisions.

The European Pollutant Release and Transfer Register (E-PRTR)

The E-PRTR is the Europe-wide register that provides easily accessible key environmental data from industrial facilities in European Union Member States and in Iceland, Liechtenstein and Norway.

The register contains data reported annually by some 30,000 industrial facilities covering 65 economic activities across Europe, and complements the IED. It should be noted that some activities are covered by E-PRTR but not by IED (e.g. mining).

The E-PRTR registry contains details at Member State level of plants and related pollution/ discharges information throughout the EU, also enabling searches on individual or groups of pollutants to be made, including heavy metals, pesticides, greenhouse gases and dioxins for the year 2007 onwards. Some information on releases from diffuse sources is also available. Member States update the register's website annually.

The E-PRTR contributes to transparency and public participation in environmental decision-making. It implements, for the European Union, the UNECE (United Nations Economic Commission for Europe) PRTR Protocol to the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

An evaluation of the E-PRTR concluded in 2016 that whilst the E-PRTR Regulation was very much fit for purpose, some elements could be improved, e.g. in areas where there were opportunities for simplification and cost savings, and where the scope of the current Regulation could be extended to improve coherence with the following policy areas:

- the IED (for some industrial activity definitions, and for the Large Combustion Plant inventory)
- EU waste law (e.g. level of detail required for waste types when reporting transfers, and risk of discrepancies in reporting, depending on whether the waste is being treated, or disposed of)
- the Emissions Trading System (and differences in activities and thresholds)
- · water legislation (and emission to water reporting requirements); and
- the INSPIRE (INfrastructure for SPatial InfoRmation in Europe) directive, relating to the interoperability of spatial datasets.

Your role – what you can do to help us ... and the EU

The purpose of this consultation is to gather the views of the public on revising the IED and E-PRTR.

First of all, we would like to enlist your help in understanding existing problems better. Secondly, we are trying to identify policy options to address these problems efficiently, clearly and coherently.

We are conducting the work on Impact Assessment to possibly revise the IED and the E-PRTR in parallel, to make the process more coherent and streamlined.

Content of this consultation

The consultation is divided into three parts:

- Part 1 asks for some information about you (such as which country you come from).
- Part 2 aims to gather information on general awareness and views of the impact of large (agro)industrial plants on the environment and the measures to manage it. The questions are aimed at the general public, and do not require any particular specialist knowledge, solely an interest in the area.
- Part 3 contains more detailed questions it is addressed to those persons with more experience/
 expertise in the area, who may wish to comment in greater depth on the impact of large (agro) industrial
 plants on the environment and the measures to manage it in the revisions under consideration. (Please
 also note that there will be also be a follow-on Targeted Stakeholder Survey for experts, and other
 general/ specific consultation opportunities via stakeholder meetings see below).

Part 3 gives you the opportunity to let us know if you wish to take part in the follow-on Targeted Stakeholder Survey, and also to join in more detailed focus groups, interviews and stakeholder consultations.

At the end of the questionnaire, you are also able to upload one document (e.g. technical information, Position Paper, etc) supporting and detailing your views. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire.

All responses to this consultation will be assessed and the results will be included in the analysis supporting our next steps. We will also produce a stand-alone factual summary on the input received, as well as a more detailed analysis of all consultation activities, which will be made available on the "Better Regulation" portal of the European Commission's website in the 2nd Quarter of 2021. More detailed material gathered during the consultation exercise may be uploaded to the publicly-available area of the Commission's "CIRCABC" library, and links to this will be provided to the general public.

If you have any questions, please contact the European Commission at this dedicated email address: **ENV- IED-REVISION@ec.europa.eu**

Your opinion matters, and we are very grateful to you for taking the time to answer these questions.

[1] Defined in Article 3 (10) of Directive 2010/75/EU as a combination of "best", "techniques" and "available techniques". Using this trio of conditions, the emphasis of the end result is (sensu lato) on achieving the most effective way of protecting the environment as a whole, under economically and technically viable conditions, and referring to the way in which the installation is designed, built, maintained, operated and decommissioned.

Part 1 - About you

*Language	of mv	contribution

English

*I am giving my contribution as

Business association

*First name

Laia

*Surname

Perez Simbor

*Email (this won't be published)

1.perez@etrma.org

*Organisation/association/institution/authority name

255 character(s) maximum

European Tyre and Rubber Manufacturers' Association, ETRMA

- *Organisation size
 - Micro (1 to 9 employees)
 - Small (10 to 49 employees)
 - Medium (50 to 249 employees)
 - Large (250 or more)

EU Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register

(http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en). It's a voluntary database for organisations seeking to influence EU decision-making.

6025320863-10

*Country of origin

Please add your country of origin, or that of your organisation.

Belgium

*Publication - privacy settings

The Commission will publish the responses to this public consultation. Please choose whether you would like your details to be made public or to remain anonymous.

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

PLEASE TICK THIS BOX if you wish to remain Anonymous. We will only publish your type of respondent, country of origin and contribution. We will not publish any other details (name, organisation name and size, transparency register number, etc).

Public

PLEASE TICK THIS BOX if you are happy to make your submission Public. We will publish your identification details (name, organisation name and size, transparency register number, country of origin) and your contribution.

I agree with the personal data protection provisions (https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement_en)

Part 2 – General awareness and views on the environmental impacts of agroindustrial activities

This section asks about your general awareness of industrial emissions policy and to gather general views on revising the Industrial Emissions Directive (IED) and European Pollutant Release and Transfer Register (E-PRTR) Regulation. In each question, please select the answer which best represents your views.

Please note that you can choose to respond to this section - Part 2 – and then choose not to answer the following section (Part 3). NB Also, in either Part 2 or Part 3 – you do not need to answer all of the questions.

1. How important are the impacts of large industrial plants and intensive agricultural installations on the following environmental issues? :

	Very Importa nt	Imp orta nt	Neither important nor unimportant	Not so importan t	Hardly importan t	l don't know
Air pollution	0		0			
Soil pollution (contaminated land)			0			0
Pollution of rivers, lakes and ground water			0			0
Marine pollution	0	0	0		0	0
Emissions of greenhouse gases		0	0			0
Depletion of natural resources		0	0		0	0

Perturbing natural habitats and ecosystems			0		0
Odour pollution	0		0		
Noise pollution	0		0		
Other types of pollution or impacts	0	0	0	0	0

If other please specify

300 character(s) maximum

ETRMA answers refer to the potential impacts of the rubber industry. Environmental regulation in place is enough, measures to limit are already in place

2. Today, what is the contribution of large (agro)industrial plants to the following techno-economic and environmental objectives ? :

	Very importa nt	mporta orta nor unimportant		Not so important	Hardly important	I don't know
Achieving a climate- neutral economy	0		0	0	0	0
Promoting green growth	0		0	0	0	0
Achieving a Circular Economy in the EU	0		0		0	0
Other	0		0		0	0

If other issues, please specify

300 character(s) maximum

The rubber industry is essential to enable a transition to a circular economy and a green growth. Environmental regulation in place is enough; measures to limit emissions are already in place in rubber production sites

3. Post-2030, how important should the role be of large (agro)industrial plants for the following technoeconomic and environmental objectives ? :

	Very import ant	Imp orta nt	Neither important nor unimportant	Not so importa nt	Hardly importa nt	l don't know
Achieving a climate-neutral economy	0		0			
Promoting green growth	0		0	0	0	0

Achieving a Circular Economy in the EU	0		0		0
Minimising pollution of soils, water and air in the EU	0	0	0		0
Minimising industry's emissions of greenhouse gases		0	0		
Minimising agriculture-related emissions of greenhouse gases		0	0		
Minimising effects on nearby natural habitats and ecosystems		0	0		
Minimising noise pollution	0	0		0	0
Minimising odour pollution	0	0	0	0	0
Facilitating other changes	0		0	0	0

If other changes, please specify them

300 character(s) maximum

The rubber industry is essential to enable a transition to a circular economy and a green growth. Environmental regulation in place is enough; measures to limit emissions are already in place in rubber production sites

4. In the place where you mostly live, work or study, are there:

	Please tick one
No large (agro)industrial activities (if so, you may wish to skip Questions 5, 6 & 7)	
Relatively few large (agro)industrial activities?	
Some large (agro)industrial activities	0
Medium levels of large (agro)industrial activities	
High levels of large (agro)industrial activities	0
I do not know	

5. With regard to available information on the level of environmental impacts of large (agro)industrial plants in your places of interest (place where you live, work or study), do you agree that:

	• , .					
	Stro ngly agr ee	Mode rately agree	Neither agree nor disagree	Moder ately disagr ee	Stron gly disag ree	l do n't kn ow

You have access to sufficient information on the types of environmental impacts of large (agro)industrial plants?	0	0	0	0
You have access to sufficient information on the level of environmental impacts of large (agro)industrial plants?		0		0

Optional: You can provide reasons for the above answer

300 character(s) maximum

6. With regard to the granting, revision or enforcement of operating permits for large (agro)industrial plants in your places of interest (place where you live, work or study), how important is the principle that the public can find the information on the following questions...:

	Very imp orta nt	I m p or ta nt	Neither important nor unimportant	Not so impo rtant	Hardl y impor tant	l do n't kno w
Which authority is responsible for granting and enforcing permits for the operation of large (agro)industrial plants?		0	•			0
How can I participate in the granting or revision of permitting decisions for large (agro)industrial plants?	0	0	•	0		0
How can I appeal against the granting of such permits, or appeal for them to be revised?	0	0	•	0	0	0

Optional: You can provide reasons for the above answer

300 character(s) maximum

7.	For v	our places	of interest ((where vo	ou live.	work or	study).	can v	ou find	information	on the	following?	,

			I	
			d	
			0	
	Υ	N	n'	
	е	0	t	
	s		k	
			n	
			0	
			w	

New or recent environmental permit applications to operate large (agro)industrial plants		
Environmental permits that have already been granted to operate large (agro)industrial plants	0	0
Compliance details for operators of large (agro)industrial plants with their environmental permit conditions		
Emissions monitoring data related to large (agro)industrial plants		
Reporting information on environmental management performance of large (agro)industrial plants (e.g. resource consumption, energy use, greenhouse gas emissions, other)	0	
Information on best available techniques (BAT) for industry sectors / farming installations	0	0
Administrative and judicial review procedures and decisions related to the operation of large (agro)industrial plants	0	0

On behalf of the DG Environment IED Team, thank you very much for your time and your contribution!

NB PLEASE FEEL FREE TO STOP HERE, OR TO CONTINUE TO PART 3 (DETAILED QUESTIONS, requiring some specialised knowledge)

If you have any questions, please contact the European Commission at this dedicated email address: **ENV-IED-REVISION@ec.europa.eu**

Part 3 – Detailed questions on revision of the IED and the E-PRTR

Part 3 seeks to gather more detailed views on revising the IED provisions and the E-PRTR. Please select the answer which best represents your views.

Please note that you can choose to respond to Part 3 only. Not all questions need to be answered.

8. Do you agree with the following statement, with regard to each environmental issue outlined below? "The existing Industrial Emissions Directive, supplemented by horizontal legislation (e.g., Framework Directives on Waste and Water, Emissions Trading System, etc) and guidance on operating large (agro)industrial plants, sufficiently controls environmental impacts from these installations regarding...":

	Strong ly agree	Moderat ely agree	Neither agree nor disagree	Moderatel y disagree	Strongly disagre e	l don't know
Air quality		0	0		0	
Fresh water quality		0	0		0	

Marine water quality	0	0			0	
Efficient water use in processes			0	0		
Efficient energy use in processes			0	0		
Emissions of greenhouse gases			0	0		
Consumption of raw materials						
Soil contamination						0
Generation of waste		0	0	0	0	0
Habitats and ecosystems, especially close to installations			0	0		
Fostering Circular Economy approaches				0		
Noise emissions		0				
Odour emissions		0			0	0
Other issues	0		0	0	0	0

If other issues, please specify them	
300 character(s) maximum	

9. For existing sectors covered by IED BREFs, to what extent do you agree that the following activities carried out at large (agro)industrial plants still have a significant negative impact on the environment and on human health?

	Stron gly agree	Modera tely agree	Neither agree nor disagree	Moderate ly disagree	Strongl y disagre e	l don't kno w
Energy – large combustion plants	0	0	0			0
Energy – oil refining, gasification and liquefaction, coke ovens			0			
Metals production / processing - iron and steel, and other ferrous	0	0	0	0	0	•
Metals production / processing - non-ferrous	0	0	0	0	0	•

Mineral industry - cement, lime, magnesium oxide			0			
Mineral industry – glass, glass fibre, ceramics			0			
Production of chemicals	0	0	0	0		0
Hazardous waste management	0	0	0		0	
Non-hazardous waste management			0			
Waste incineration		0	0		0	
Independent industrial wastewater treatment plants			0			
Production of pulp and paper	0	0	0		0	
Slaughterhouses & animal by- products			0			
Ceramics industry			0			
Textiles manufacturing						
Food and drink production			0		0	
Intensive rearing of poultry or pigs	0	0	0	0	0	

Do you think that the threshold for consideration under the IED should be reduced or modified for any of the above sectors? If so, to what level(s)? (500 character maximum limit)

500 character(s) n	naximum
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10. Looking at possible NEW sectors to be covered by the IED and the associated BREFs process, to what extent do you agree that the following additional activities need to be addressed by the IED in order to significantly reduce significant negative impacts on the environment and on human health?

	Str ong ly agr ee	Mod erate ly agre e	Neither agree nor disagree	Mode rately disagr ee	Stro ngly disa gree	l do n't kn ow
Energy industries – medium combustion plants (i.e. under the IED, rather than via the existing Medium Combustion Plant Directive)			0			
Intensive rearing of cattle	0	0	0	0	0	

Intensive aquaculture (fish or shellfish farming)		0			0	
Mining industries	0	0	0	0	0	
Urban waste water treatment plants	0	0	0	0	0	
Energy – oil and gas extraction activities	0	0	0	0	0	
Landfills - management		0			0	
Storage of Hazardous Substances		0		0	0	
Other activities		0	0	0	0	0

If other activities, please specify which		
300 character(s) maximum		

11. To what extent do you think that the functioning of these current IED procedures needs to be improved in the future to optimise them?

·						
	No chan ges need ed	Minor chan ges need ed	Some chang es neede d	Many chan ges need ed	System requires a complete overhaul	d o n't kn o w
Environmental permitting procedure to operate an (agro)industrial plant		0			0	
Site inspections to ensure compliance with environmental permit conditions to operate an (agro)industrial plant		0		0	0	
Reporting of emissions monitoring data related to compliance with environmental permit conditions to operate the (agro)industrial plant		0	0	0	0	
Ease of obtaining information on what are considered to be best available techniques (BAT)		0		0	0	
Administrative and judicial review procedures related to the operation of large (agro)industrial plants		0	0	0	0	

Other issues - please specify which 300 character(s) maximum

12. How would you rate the functioning of the following aspects regarding the public's access to information in relation to agro-industrial activities and their impacts on the environment and on human health?

	Very easil y avail able	Availabl e modera tely easily	Neither easily available nor difficult to access	Moderat ely difficult to access	Very difficu It to acces s	I d o n't kn o w
Information on IED permits already granted		0	0			
Information submitted by operators/ potential operators to competent authorities prior to IED permits being granted		0	0	0	0	0
Information on the compliance of plants with IED permit conditions		0	0			
Emissions monitoring data from agro- industrial plants covered by the IED		0	0		0	0
Information on best available techniques (BAT)		0	0	0	0	0
Application of BAT at the individual (agro)industrial plants	•	0	0	0	0	0
Other public information areas related to plant covered by the IED	0	0	0	0	0	
Information on the environmental performance of large (agro)industrial plants	0	0	•	0	0	

If other public information areas, please specify which	
300 character(s) maximum	

13. To what extent do you think that enabling greater public participation in decision making in these current IED procedures needs to be improved in the future to optimise them, related to (agro)industrial activities and their impacts on the environment?

	No cha nge s nee ded	Mino r chan ges need ed	Som e chan ges need ed	Man y chan ges need ed	System requires a complete overhaul	I d o n' t k n o w
IED permit applications		0	0	0		
BAT-AEL derogation on the grounds of geographical location, local environmental conditions or installation's technical characteristics – Article 15(4) of the IED		0	0	0	0	•
Other	0	0	0	0	0	

If other areas of public participation in IED decision making should be improved , pleas	e specify which
300 character(s) maximum	

14. How would you rate the information provided in the E-PRTR regarding the environmental performance of large (agro)industrial plants?

	Very compl ete	Moderatel y complete	Neither complete nor incomplete	Moderately incomplete	Very incompl ete	l don't know
Releases to air	0	0	0	0	0	
Releases to water	0	0	0	0	0	
Releases to soil	0	0	0	0	0	
Transfers of waste	0	0	0	0	0	
Transfers to waste water treatment plants	0	0	0	0	0	•
Diffuse releases to air	0	0	0	0	0	
Diffuse releases to water	0	0	0	0	0	•
Releases of pollutants from accidents	0	0	0	0	0	•
Production volume of the facility	0	0	0	0	0	0
Other issues		0	0	0	0	

Other issi	ues - please	specify if oth	er aspects of	environmental	performance	should be cov	ered by the E	:-PRIR
300 cha	racter(s) ma	aximum						

15. How do you rate the search capability for information on industrial plant and agricultural operations in the E-PRTR? Do you consider that the following aspects work...?:

	Very well	Moderatel y well	Neither well nor poorly	Moderately poorly	Very poorly	l don't know
Search by - facility name		0	0	0		
Search by – industrial activity		0	0			
Search by - pollutant	0	0	0	0	0	0
Search by – geographical location	0	0	0	0	0	
Other	0	0	0	0	0	0

If other public information areas, please specify which	
300 character(s) maximum	

16. Going into sector-specific data in the E-PRTR, how would you rate the usefulness of the E-PRTR with regard to environmental performance data on these (agro)industrial sectors?

	Very satis facto ry	Modera tely satisfac tory	Neither satisfactory nor unsatisfactory	Moderat ely unsatisfa ctory	Very unsati sfacto ry	l do n't kn ow
Energy – large combustion plants						
Energy – oil refining, gasification and liquefaction, coke ovens			0	0		
Metals production / processing - iron and steel, other ferrous			0			
Metals production / processing - non- ferrous			0		0	
Mineral industry processes - cement, lime, magnesium oxide		0	0		0	
Mineral industry – glass, glass fibre, ceramics	0	0	0	0	0	

300 character(s) maximum

Production of chemicals

Hazardous waste management	0	0	0	0	0	
Non-hazardous waste management	0	0	0	0	0	
Waste incineration	0	0	0	0	0	
Wastewater treatment plants	0	0	0	0	0	
Production of pulp and paper	0	0	0	0	0	
Textiles manufacturing	0	0	0	0	0	
Food and drink production	0	0	0	0	0	
Intensive rearing of poultry or pigs	0	0	0	0	0	
Energy use – medium combustion plants (i.e., via IED, rather than via existing MCP Directive)		0	0	0	0	
Intensive rearing of cattle	0	0		0	0	
Intensive aquaculture (fish or shellfish farming)	0	0	0		0	
Mining industries	0	0		0	0	
Other activities						
ther activities, please specify which 00 character(s) maximum Thinking in more detail about the pollutar		·				
Are there any pollutants that should be re	moved fr	om the E-P	RTR?			

18. How well does public access to justice function in relation to (agro)industrial activities (e.g., siting of plant, operating permits etc)?

300 character(s) maximum

	Ve ry we II	Mode rately well	Neither well nor poorly	Moder ately poorly	Ver y poo rly	I don' t kno w
Public access to justice in my Member State				0		
Public access to justice at the EU level				0		
The right to bring a case before a court, or to ask for a judicial review in my Member State, functions		0	0	0	0	0
Other related elements	0	0	0	0	0	

If you refer to other related elements, please specify which
300 character(s) maximum
If you think that other areas of public access to justice need to be addressed or improved with regard to agro-
industrial plants, please specify which

19. In order to reach the objectives listed in the table below, what would be the necessary level of contribution from operators of large (agro)industrial plants? :

	V er y hi g h	H ig h	M o d er at e	L o w	V er y lo w	I d o n' t k n o
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	0	0		0	0	0
Contributing to a Circular Economy	0		0	0		0
Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	0	0		0	0	0
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy	0	0		0	0	0
Other	0		0	0		0

If "other", please specify which
300 character(s) maximum

20. 'In order to achieve the objectives listed in the table below, what would be the degree of effort needed from Member States' responsible competent authorities for large (agro)industrial plants? :

	V er y hi g	H ig h	M o d er at e	L o w	V er y lo w	I d o n' t k n o
Progress towards achieving zero pollution (where emissions still occur, but within the carrying capacity – spatially and temporally – of air, water, soil, and ecosystem receptors)	0	0	0	0	0	
Contributing to a circular economy						
Supporting the transition to climate-neutral EU industry sectors through modernisation and decarbonisation	0	0	0	0	0	
Support innovation and forward-looking uptake of new technologies to facilitate industry's shift to a climate neutral and circular economy		0	0	0	0	
Enhancing coherence with other EU environmental legislation						
Enhanced coherence with other EU safety-related legislation	0			0		
Simplifying provisions				0		
Other	0	0	0	0	0	0

If "other", please specify which

300 character(s) maximum

Industry efforts to achieve a full circular economy, decarbonization and innovation need the full support from member states as they have a key role in supporting the transition of the industry

21. Could the following objectives be achieved by EU Member States alone without intervention at EU level? (i.e. greater use of subsidiarity)

Str ong ly agr ee	Mod erate ly agre e	Neither agree nor disagree	Moder ately disagr ee	Stro ngly disa gree	l do n't kn ow
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0	0				
0					0
0					
					0
0	0	0	0	0	0

If "other",	please s	specify	which
300 cha	racter(s)	maxim	nıım

22. When reviewing policy options in the IED and E-PRTR, how would you assess the following, in relative importance?

	Ve ry im po rta nt	Rel ativ ely imp orta nt	N e ut ra I	Rela tivel y uni mpo rtant	N ot i m p or ta nt	I d o n' t k n o
Options that contribute to a zero-pollution ambition for a toxic-free environment		0	0	0		0
Options that support EU industry's transition to becoming climate- neutral through decarbonisation		0	0			0
Options that realise EU industry's potential contribution to a circular economy		0	0	0		0
Options that support new technologies and innovation, that will support competiveness and resilience and facilitate industry's shift to a climate-neutral, clean and circular economy	0				0	0
Options that support public access to environmental information relating to the impacts of industrial emissions; and also	0	0		0	0	0

Options to ensure a level playing field for companies and consistent regulatory implementation across EU Member States		0		0	0	0
Options that empower public participation in environmental decision making and access to justice.	0	0	0	0	0	
Options that keep the administrative burden on business, and on government administrations, at a low level, but without compromising the effectiveness and efficiency of the EU in meeting its objectives	0				0	0
Other		0		0		0

lf	"other",	please	specify	which
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300 character(s) maximum

23. In your opinion, when reviewing options for the revision of the IED, what are the main future potential impacts on large (agro)industrial plants that will need to be assessed (max. 500 characters, please)?:

500 character(s) maximum

24. Following COVID-19, how do you assess the following statements?

	S tr o n gl y a gr e	M od er at el y ag re e	Neit her agre e nor disa gree	Mo der ate ly dis agr ee	St ro ng ly di sa gr ee	I d o n' t k n o w
Revisions to the IED should very strongly contribute to the acceleration of the transition towards a green and digital economic recovery					0	
Funding earmarked for the "Green Deal" and for the EU's transition to a zero-pollution economy by 2050 should not be diverted to continue the "business as usual" trend regarding agroindustrial plants as part of the EU's response to COVID-19	0					
Other		0	0	0		

If "other", please specify which 300 character(s) maximum

25.	Whilst maintaining the effectiveness of the IED/EPRTR legislation, would you see any possibilities to
redu	uce costs?:

500 character(s) maximum

26. What is your view on the capacity of the IED and EPRTR to ensure a level playing field and fair competition?

500 character(s) maximum

Any other comments

Please include any further information that would be useful for the ongoing impact assessments of the Industrial Emissions Directive (IED) or E-PRTR Regulation. In particular, please provide public references to relevant studies, position papers, and case studies or alternatively, please upload relevant documents. If you have already uploaded such a document as part of consultation activities undertaken for the reviews of the IED or the E-PRTR Regulation, please do NOT upload the same document again here.

If you are familiar with the IED and its implementation, or the E-PRTR, please indicate if you are happy to be contacted to participate in targeted consultation activities.

- YES, please include me / my organisation in the targeted consultation activities on revision of the IED
- YES, please include me / my organisation in the targeted consultation activities on revision of the E-PRTR

In particular, if you have any further information that you believe would be useful for this impact assessment, please respond to the subsequent Targeted Stakeholder Survey that will also be conducted for this study. The targeted survey offers the opportunity to provide public references/documents for relevant studies.

On behalf of the DG Environment IED Team, thank you very much for your contribution to this Consultation!

If you have any questions, please contact the European Commission at this dedicated email address: **ENV-IED-REVISION@ec.europa.eu**

Contact

ENV-IED-REVISION@ec.europa.eu